



Mayer Brown LLP  
1221 Avenue of the Americas  
New York, NY 10020-1001  
United States of America

T: +1 212 506 2500  
F: +1 212 262 1910

mayerbrown.com

March 12, 2020

**VIA ECF**

Hon. George B. Daniels  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**A. John P. Mancini**  
Partner  
T: (212) 506-2295  
jmancini@mayerbrown.com

Re: **Pro Music Rights, LLC v. YouTube, LLC**  
**1:19-cv-11618-GBD (S.D.N.Y.)**

Dear Judge Daniels:

We represent YouTube LLC<sup>1</sup> ("Defendant") in the above-captioned action. Pursuant to Rule II.C of Your Honor's Individual Rules and Practices, we write jointly with counsel for Plaintiff Pro Music Rights ("Plaintiff") to respectfully request that: (i) Defendant's time to respond to the operative Complaint be extended from March 23, 2020 to May 1, 2020, and (ii) the initial pretrial conference, presently scheduled for March 19, 2020, be adjourned until May 18, 2020, or as soon thereafter as the Court is available.

Plaintiff consents to both requests. Neither Defendant nor Plaintiff has previously requested an extension or adjournment of the above-mentioned deadlines, nor do these requested extensions and adjournments affect any other scheduled dates.

Good cause exists for these requested extensions, as set forth below. Plaintiff filed this action on December 18, 2019. (ECF No. 1). That same day, Plaintiff filed a virtually identical action against Defendant's parent company Google LLC, *Pro Music Rights, LLC v. Google, LLC*, 1:19-cv-11613-GHW (S.D.N.Y.) (the "Google Action"), which was assigned to the Honorable Gregory H. Woods.

On December 27, 2019, Your Honor scheduled an initial pretrial conference for March 19, 2020. (ECF No. 6). Defendant executed a waiver of service on January 30, 2020, which extended Defendant's time to respond to the Complaint until March 23, 2020. (ECF No. 7). On February 25, 2020, Defendant filed a Related Case Statement pursuant to Rule 13(b)(3) of the Rules of the Division of Business Among District Judges for the Southern District of New York, and respectfully requested that Your Honor transfer the above-captioned action to Judge Woods. (ECF No. 10). That request is *sub judice*.

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<sup>1</sup> YouTube LLC is a wholly owned subsidiary of Google LLC.

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On March 9, 2020, Defendant advised Plaintiff that it intended to move to dismiss the operative Complaint for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6). In response, Plaintiff indicated that it is contemplating an amendment to its Complaint, to address Defendant's anticipated motion and, potentially, avoid the need for motion practice directed at the pleadings.

Given the foregoing, the parties respectfully submit that it will be more efficient for the Court and the parties if the below-referenced deadlines are extended as follows:

<b>Event</b>	<b>Current Date</b>	<b>Proposed Date</b>
Joint letter and proposed Case Management Plan	March 12, 2020	To be determined by the Court
Initial pretrial conference	March 19, 2020	May 11, 2020
Defendant's time to respond to the operative Complaint	March 23, 2020	May 18, 2020

We thank the Court for its consideration of this request.

Respectfully submitted,

*/s/ A. John P. Mancini*

A. John P. Mancini

cc: All Counsel of Record by ECF